

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CARIDAD RIVERA,

Plaintiff,

NOTICE OF REMOVAL

-against-

PETER PAN BUS LINES, INC., and GEORGE L.
SCHNEIDER,

Defendants.

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TO: THE HONORABLE JUDGES
OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Defendants Peter Pan Bus Lines, Inc., And George L. Schneider, by their attorneys,
O'Dwyer & Bernstien, LLP, respectfully allege as follows:

1. By this Notice of Removal, defendants remove this action from the Supreme Court of the State of New York, Bronx County, to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. §1441(a) and (b) and §1446(a) and (b).
2. An action was commenced by Caridad Rivera (denominated plaintiff in the state court action) by the filing of a Summons and Complaint April 6, 2018. (A copy of the Summons and Complaint bearing Index No. 24054/2018E is annexed hereto as Exhibit "A"). Service of process was made upon defendant Peter Pan Bus Lines, Inc., on April 12, 2018.
3. The underlying State Court action arises from a motor vehicle accident alleged to have occurred on September 15, 2017 in the County of New Castle, State of Delaware. Plaintiff seeks damages for alleged bodily injuries sustained as a result of the accident.

4. The Court has jurisdiction of this proceeding pursuant to section 28 U.S.C. § 1332, in that there exists a diversity of citizenship in this case. Plaintiff Caridad Rivera is a resident of the State of New York; defendant George L. Schneider is a resident of the State of Maryland, defendant Peter Pan Bus Lines, Inc. is a resident of the Commonwealth of Massachusetts where it was incorporated and maintains its principal place of business in the Commonwealth of Massachusetts.

WHEREFORE, defendants Peter Pan Bus Lines, Inc., And George L. Schneider seek removal of the above-entitled action from the Supreme Court of the State of New York, County of Bronx, to the United States District Court of the Southern District of New York.

Dated: New York, New York
April 27, 2018

Yours, etc.,

O'DWYER & BERNSTIEN, LLP

By: Christopher Downes (CD-8631)
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